

UNITED STATES DISTRICT COURT

for the
Middle District of North Carolina

In the Matter of the Search of

*(Briefly describe the property to be searched
or identify the person by name and address)*Priority Mail Express parcel bearing mailing label with
tracking number EM082781535US located at 251 North
Main Street, Winston-Salem, North Carolina 27101

Case No. 1:19MJ149

APPLICATION FOR A SEARCH WARRANT

I, a federal law enforcement officer or an attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that on the following person or property *(identify the person or describe the property to be searched and give its location)*:

Priority Mail Express parcel bearing mailing label with tracking number EM082781535US located at 251 North Main Street, Winston-Salem, North Carolina 27101

located in the Middle District of North Carolina, there is now concealed *(identify the person or describe the property to be seized)*:

Controlled substances and/or materials and documents reflecting the distribution of controlled substances through the U. S. Mail.

The basis for the search under Fed. R. Crim. P. 41(c) is *(check one or more)*:

- ☒ evidence of a crime;
- ☒ contraband, fruits of crime, or other items illegally possessed;
- ☒ property designed for use, intended for use, or used in committing a crime;
- ☐ a person to be arrested or a person who is unlawfully restrained.

The search is related to a violation of:

Code Section
21 U.S.C. § 841
21 U.S.C. § 843(b)

Offense Description
Distribution and Possession with Intent to Distribute a Controlled Substance
Use of a Communication Facility to Facilitate Distribution of a Controlled Substance

The application is based on these facts:

See attached affidavit incorporated by reference herein

- ☒ Continued on the attached sheet.
- ☐ Delayed notice of days (give exact ending date if more than 30 days:) is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.

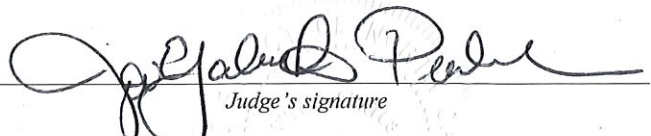

Applicant's signature

Angela D. Pollard, US Postal Inspector

Printed name and title

Sworn to before me and signed in my presence.

Date:

5/10/2019City and state: Winston-Salem, North Carolina

Judge's signature

Joi Elizabeth Peake, U. S. Magistrate Judge

Printed name and title

AFFIDAVIT

The undersigned, being duly sworn, deposes and states:

1. I, Angela D. Pollard, am a United States Postal Inspector and have been so employed since 1999. I completed a fourteen week basic training course at the United States Postal Inspection Service Training Academy in Potomac, Maryland. I have received specialized training in Interview and Interrogations, Mail Theft Investigations, Prohibited Mailings Narcotics, Property and Evidence Handling Procedures, Workplace Violence Prevention, Field Legal Training, and Confidential Informant Training. Prior to starting the Postal Inspection Service Training Academy, I was a Law Enforcement Officer in the City of Fayetteville, North Carolina from 1989-1999. While employed by the City of Fayetteville, I received specialized training in Homicide Investigations, Narcotics Investigations, Sexual Assault Investigations, Field Training Officer training, in addition to numerous other trainings. I am currently assigned to the Prohibited Mail Narcotics Team in Greensboro, North Carolina, Charlotte Division, which is responsible for investigations of violations involving the United States Mail, including the use of the U.S. Mails to transmit controlled substances, in violation of Title 21, United States Code, Sections 841 and 843(b).
2. On May 7, 2019, a Priority Mail Express parcel bearing tracking number

EM082781535US (hereafter “the Suspect Parcel”) entered into the mail stream in San Pedro, California 90731. The Suspect Parcel was addressed to “Brandon Bailey, 6053 yeaton glen dr, Winston Salem NC 27107.”

3. On May 9, 2019, Postal Inspectors conducting an interdiction deemed the Suspect Parcel as suspicious in nature. The Suspect Parcel was from a source state for narcotics (California), had a handwritten label, and the entire box was heavily taped.
4. The Suspect Parcel is described as follows:
 - A. Addressed to: “Brandon Bailey, 6053 yeaton glen dr, Winston Salem NC 27107”
 - B. From: “Victor Arugula, 832 W 4th st, San Pedro CA 90731”
 - C. Size: approximately 11” X 18.5” X 6”
 - D. Weight: approximately 4 pounds, 11.90 ounces
 - E. Postage affixed: \$67.15
 - F. Physical description: a box that had blue and white postal tape covering the entire box, bearing Priority Mail Express tracking number EM082781535US.
5. On May 9, 2019, investigators attempted to verify the information provided on the Priority Mail label for the Suspect Parcel by using law enforcement databases. The Inspections Service was able to determine

that the name of the recipient (Brandon Bailey) of the Suspect Parcel is not associated with the address on the label for 6053 Yeaton Glen Drive, Winston-Salem, North Carolina 27107. The sender's address (832 West 4th Street, San Pedro, California 90731) for the Suspect Parcel is not a valid address.

6. I am aware, through my training and experience, that people who utilize the U.S. Mail to distribute controlled substances commonly use fictitious names and addresses in an attempt to avoid detection by law enforcement agencies. I am also aware that California is a source state for the distribution of narcotics, and North Carolina is a known destination for controlled substances sent through the U.S. Mail.
7. I am also aware that people often use the U.S. Mail, specifically Priority Mail Express and Priority Mail, for the delivery of controlled substances for various reasons, some of which are listed below:
 - A. Items sent via Priority Mail Express and Priority Mail are considered to be First-Class Mail. Therefore, these items cannot be examined without a federal search warrant.
 - B. Priority Mail Express and Priority Mail are generally expected to be delivered in one to three days. This assures the sender of expedited delivery.
 - C. Various dispatch times (times in which a mailed item is

transported to the next destination) are available to customers upon request and provide the sender with an opportunity to have some control as to the arrival time of the mailed item.

- D. Individuals desiring to either send or receive controlled substances and payments for these substances through the U.S. Mail can do so without having to provide identification. This reduces the possibility of revealing their true identities.
8. On May 9, 2019, Drug K-9 Detective Justin Blanks of the Greensboro Police Department, assigned to the Vice Narcotics Division, was contacted regarding the Suspect Parcel. Detective Blanks and drug detecting Canine Kash (hereafter, "Kash") responded to the Greensboro Network Distribution Center in the Middle District of North Carolina.
9. The Suspect Parcel was placed in a lineup with four other parcels at the Greensboro Network Distribution Center in the Middle District of North Carolina, none of which contained a controlled substance. Kash walked among the parcels. Kash alerted only to the Suspect Parcel by sitting and staring at the Suspect Parcel, which was Kash's signal to indicate the scent of a controlled substance. The examination took place at 9:32 a.m. on May 9, 2019.
10. Detective Justin Blanks has been a sworn law enforcement officer for the past fourteen years with the Greensboro Police Department, having

completed Basic Law Enforcement Training (BLET) in May 2001. Detective Blanks is currently assigned as an Investigative Interdiction Detective on the Vice Squad in the Vice & Narcotics Division of the Greensboro Police Department and has worked narcotics investigations specifically since January 2006. In January 2014, Detective Blanks was selected to be a Narcotics Detection Dog Handler and was assigned K-9 Peaches, a five-year-old Yellow Labrador Retriever (retired-November 2017). In December 2017, Detective Blanks was again selected to be a Narcotics Detection Dog Handler and assigned Kash, a German Shepard, a breed specifically selected for its keen senses and ability to be trained to detect the odor of controlled substances.

11. In addition to BLET, Detective Blanks has attended the Police Law Institute and the following trainings: Street Crimes, Basic Narcotics Investigators course, Airport Narcotics Investigations, Introduction to Conspiracy Investigations, Highway and Rural Drug Investigations, Advanced Criminal Interdiction, Basic K-9/Detector Dog Training, High Risk Apprehensions, Bus Interdiction, Parcel Interdiction, Train Interdiction, and has attended numerous other seminars. Detective Blanks has been certified through the U.S. Drug Enforcement Administration's Operation JETWAY Training program to conduct all manner of Interdiction Investigations and has completed well over 500

hours of training throughout his career with the majority of the training focusing on illegal narcotics.

12. In addition to his current assignment, Detective Blanks has served the department as a Patrol Officer, Police Training Officer, and as a street-level drug officer. Detective Blanks is a member of the North Carolina Narcotics Enforcement Officers Association, the International Narcotics Interdiction Association (INIA), and the International Police Working Dog Association. In 2003, Detective Blanks was recognized by the Greensboro Police Officers Association as Officer to the Year, and has received Officer of the Month on numerous occasions. In 2011, Detective Blanks' Investigative Interdiction Team was selected as the INIA International Interdiction Group of the Year.
13. Detective Blanks has conducted and assisted in narcotics investigations leading to the arrest and conviction of numerous narcotics traffickers in the State of North Carolina, 18th Prosecutorial District (Guilford County), and the United States District Court for the Middle District of North Carolina.
14. Detective Blanks has conducted and assisted in numerous narcotics investigations leading to the arrest and conviction of narcotics traffickers in the State of North Carolina, 18th Prosecutorial District and the United States Federal Court of the Middle District of North Carolina.

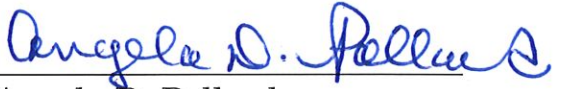
15. In December 2017, Kash was purchased from Ventosa Kennels, located in Scotland Neck, North Carolina, by the Greensboro Police Department. After undergoing several tests as to his suitability as a police work dog, Kash was accepted by the Canine Division and began training in December 2017. Kash and Detective Blanks have completed 200 hours of basic canine detection training with Corporal Dwayne Diaz, a canine handler and trainer who has multiple years of experience in the Canine Division of the Greensboro Police Department.
16. Kash has demonstrated that he can reliably use his olfactory senses to locate the odor of controlled substances, which include heroin, cocaine, crack cocaine, marijuana, hashish, methamphetamine, and ecstasy. After successful completion of this training, Kash entered into service with the Greensboro Police Department, Vice & Narcotics Division as a narcotics detection K-9 in December 2017.
17. In training with the Greensboro Police Department, Kash was "imprinted" to detect the odor of cocaine, crack cocaine, marijuana, hash, methamphetamine, heroin, and ecstasy. At the beginning of training, the officers placed all seven substances in a hidden box, and Kash was rewarded with a toy when he correctly alerted. Then, the officers removed one substance at a time, and repeated the testing, until Kash could detect the presence of any of the substances individually.

18. On February 5, 2018, Blanks took Kash to Fayetteville, North Carolina, to undergo testing by the International Police Working Dog Association. Joseph Salisbury of the Cumberland County Sheriff's Office administered the tests. Kash underwent three tests. The first was an open air field test where narcotic substances were hidden in four locations in a field or a parking lot. Kash successfully found the four hidden locations of controlled substances. The second test was of an interior room. Kash had to search five rooms, and alert to the presence of controlled substances. One of the rooms did not have any controlled substances, and was blank. Kash successfully alerted to the four rooms that had controlled substances, and did not alert to the blank room. The third test involved vehicles. Kash had to search eight school buses. Two of the buses had no drugs. Kash successfully alerted to the six buses that had controlled substances and successfully did not alert on the two buses with no narcotics. Based on his one hundred percent successful rate of testing, Kash received certification from the International Police Working Dog Association. This certification is valid for fifteen months from the date of issuance.
19. Kash is trained to give a "Passive Alert" after detecting the odor of narcotics. This "Passive Alert" consists of a physical reaction that ultimately ends in the dog coming to a sitting position or alternating


looks between Detective Blanks and the point of narcotics. Kash also exhibits various mental and physical reactions that are noticeable to Detective Blanks, which include changes in his behavior such as becoming possessive of the area, refusing to leave an area where the odor of narcotics is detected, and changing his breathing rate and sniffing patterns.

20. Detective Blanks has successfully demonstrated the ability to properly deploy Kash and locate hidden narcotics. Kash has successfully detected narcotics that have been concealed in locations including the following: sealed packages, residential homes and outbuildings, automobiles, tractor-trailers, luggage, electrical components, and appliances, in the ground and elsewhere.
21. On February 5, 2018, the K-9 detection team of Kash and Detective Blanks was certified as a K-9 detection team. From February 5, 2018 through February 1, 2019, Kash and Detective Blanks located and seized no less than 694.5 pounds of marijuana, 3.46 pounds of methamphetamine, 4.4 pounds of cocaine, and \$64,320.00 in United States Currency (as of the usage report dated February 1, 2019).
22. Based on the above facts, there is probable cause to believe that the Suspect Parcel contains at least one controlled substance that is being shipped from a source state (California) to North Carolina, in violation

of 21 U.S.C. §§ 841 and 843(b). As such, I respectfully request that a Search Warrant be issued for the Suspect Parcel.


Angela D. Pollard
U.S. Postal Inspector

Sworn to and subscribed before me this 10 day of May 2019.


The Honorable Joi Elizabeth Peake
United States Magistrate Judge